

October 14, 2022

Washington State Building Codes Council  
c/o Anthony Doan  
Chair, State Building Codes Council  
PO Box 41449 Olympia, WA 98504

Re: Proposed Changes to Washington State Building Codes, All Codes, Group 2

To the WA State Building Codes Council,

I am writing to urge the State Building Codes Council to reconsider moving forward with the proposed changes to the residential building code. As a builder with over 20 years of experience in the field, I fear that these changes are rushed, and our state is not prepared for the potential impacts they present. Everyone I know is struggling with a variety of issues right now, and the proposed changes only add to those struggles. Builders like myself struggle with supply chain issues and the rising cost of products that we need to complete projects efficiently and safely. In turn, these problems get passed on to those looking to purchase a home in the form of higher costs both up front and over the life of a mortgage. Washington families are at a breaking point and none of us can afford to take on more of the burden.

Specifically, my concerns are:

- Mandating heat pumps and a de facto switch to full electrification.
- Heat pumps are costly, both up front and to regularly maintain or repair.
- We do not have adequate infrastructure in the areas that will be affected the most.
- Heat pumps don't work properly in extreme weather conditions.
- Lowering our air leakage rates at this time suggests a lack of awareness about the current economy.
- Required product is extremely difficult to get and will cause delays and boarded up windows on new homes.
- It is far more practical to improve the insulation in a home and more cost effective.
- Requiring EV circuits will only add more costs to a project and those costs will be passed on to the buyer.
- It is difficult and costly to find an electrician qualified to connect these circuits and walls will have to be left open for some period of time, which is a safety hazard.
- The Wildland Urban Interface Code places arbitrary limits on where homes can be built and further limits available space to build.
- The SBCC is going above and beyond the authority given by the legislature.

Ultimately, these proposed changes place multiple obstacles in the way of providing what our region and our state need. That is more affordable housing. Builders like myself can be the solution to the housing shortages we are facing, if we have more freedom to build. More housing equals more supply, which brings down the cost of housing overall. These

code changes ensure that we will need to bid on where we can build, and we will need to charge top dollar for our finished product to compensate for our costs. Nobody wins in a scenario where options for the builder are this limited.

Thank You,  
Mark Barton